

EXHIBIT G

1
2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 Civil Action No: 19-civ-1998 (NRB)

5 -----)

6 ERIC A. ELLIOTT (p/k/a) FLY HAVANA),

7 Plaintiff,

8 v.

9 JOSEPH ANTHONY CARTAGENA (p/k/a) FAT JOE),

10 et al.,

11 Defendants.

12 -----)

13
14 STATEMENT ON THE RECORD

15 February 25, 2021

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23 Reported by:

24 Linda Salzman

25 Job No. 190588

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1
2 February 25, 2021
3 1:19 p.m.
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5 ZOOM REMOTE STATEMENT ON THE
6 RECORD, before Linda Salzman, a
7 Notary Public of the State of New
8 York.
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2 A P P E A R A N C E S: (Cont'd)
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4 PRYOR CASHMAN
5 Attorneys for Defendants Roc Nation
6 LLC, Roc Nation Management Inc., Songs
7 of Universal Inc. and Universal Music
8 Z Tunes LLC
9 7 Times Square
10 New York, New York 10036
11 MS. LAUREN COOPERMAN, ESQ.
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2 A P P E A R A N C E S:
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7 Suite 1
8 Media, P.A. 19063
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12 Attorneys for Defendant Joseph Anthony
13 Cartagena (p/k/a) Fat Joe, et al.
14 437 Madison Avenue
15 New York, New York 10022
16 MS. ELEANOR LACKMAN, ESQ.
17 MS. ELAINE NGUYEN, ESQ.
18
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20 PARNES LAW FIRM
21 Attorneys for Defendant Edward F.
22 Davadi, Jr.
23 136 Madison Avenue
24 New York, New York 10016
25 MR. HILLEL PARNES, ESQ.

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1 Statement on the Record
2 MS. LACKMAN: I would like to
3 make a statement for the record. It
4 is 1:20 p.m. on February 25, 2021, at
5 a deposition that was noticed for 1
6 o'clock.
7 I would like to mark as Exhibit
8 1 a Subpoena.
9 (Defendants' Exhibit 1,
10 Subpoena, marked for identification,
11 as of this date.)
12 MS. LACKMAN: Thank you. I just
13 introduced a Subpoena that was issued
14 on February 10, 2021, noticing a video
15 deposition for February 25th at 1
16 o'clock. The Subpoena further
17 identifies that documents were
18 required to be produced by February
19 22, 2021. I will note for the record
20 that no documents have been produced
21 to date by the witness Mr. Elis
22 Pacheco and that Mr. Pacheco has not
23 appeared. With that I have no further
24 statements.
25 Mr. Fluehr, would you like to

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Statement on the Record

say anything for the record?

MR. FLUEHR: Yeah, just that we don't object to taking Mr. Pacheco's testimony overall, but we do object to the process taking place in that discovery hasn't proceeded and that this one issue is being focused on. I think there's independent reasons to go forward with discovery. We just don't want our participation in this deposition to be used as waiver in any way of our continuing objections, and we anticipate that defendants will seek permission from the court to refile for summary judgment at the appropriate time as the court has previous indicated in its orders.

MS. LACKMAN: Thank you.

Does any other counsel have any other statement for the record? No. All right. I think we can conclude the deposition for today. Thank you all for your time. Thank you to the court reporter and the videographer.

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss.

COUNTY OF NEW YORK)

I, Linda Salzman, a Notary Public

within and for the State of New

York, do hereby certify that the

within is a true and accurate

transcript of the proceedings taken

on February 25, 2021.

I further certify that I am not

related to any of the parties to

this action by blood or marriage and

that I am in no way interested in

the outcome of this matter.

IN WITNESS WHEREOF, I have

hereunto set my hand this 25th day

of February, 2021.

Linda Salzman

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Statement on the Record

I'm sorry that it was not lengthier than what we have and we appreciate the time.

(Time noted 1:23 p.m.)

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----- I N D E X-----

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